

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

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| In The Matter Of |) | |
| |) | GN Docket Number 16-142 |
| CONSIDERATION OF A REQUEST |) | |
| FOR RULE MAKING TO |) | |
| AMEND SECTION 73.626 OF THE |) | |
| COMMISSIONS RULES REGULATING |) | |
| DISTRIBUTED TRANSMISSION |) | |
| SYSTEMS. |) | |

COMMENTS OF THE NATIONAL TRANSLATOR ASSOCIATION

INTRODUCTION

The National Translator Association (NTA) here submits comments on the joint request of America's Public TV Stations (APTS) and the National Association of Broadcasters (NAB) to request the start of a rule making, looking to revisions in Section 73.626 of the Commission's rules and in related rules and policies concerning Distributed Transmission Systems (DTS), Public Notice DA-19-1036 released on October 11, 2019.

With all due consideration of the issues raised by these parties, NTA is opposed to the request at this time, principally because we believe it is premature. ATSC1 is the video transmission standard now. "Next Gen" (ATSC 3.0) is expected to complement it, and eventually perhaps to replace it as the standard way into the future. But 3.0 is incompatible with the present system, and the public's paramount interest must be to preserve interference-free TV for present reception. The implementation of DTS is an element — an important one — to the build-out of fully realized 3.0 services. The issues suggested here for rule making should be considered in three to five years, once the penetration of home reception and broadcast station transmissions are both far enough along for the affected parts to understand many of the strengths and weaknesses in this ambitious upgrade and replacement program.

NTA is a non-profit membership and advocacy organization, dedicated to assuring the delivery of free over-the-air television to every household in the United States. Translators serve a vital role in all regions of the country and NTA has membership in all regions, but with a concentration of members in the states of the Inter-Mountain West and the Pacific Coast where terrain and historical factors have let to extensive use of TV translators to deliver television signals to isolated rural area, providing free-over-the-air signals to both large and small communities.

THE ISSUES

The proposal to allow DTS systems to overlap existing contours may impact ATSC1 translator signals of a different licensee. The present protected contours for television signal transmission insure that each station is accorded an interference free service area within those boundaries. To establish service with TV translators, stations must choose an output channel that is different from that of the primary licensed facility. If that existing translator channel is within a Next Gen DTS Frequency overlap, some of the viewing public will have their ATSC1 service from that competing licensee station impacted, reducing Free TV service.

The Commission has established a transition from ATSC1 to Next Gen based on public acceptance of the new service. The proposal includes the use of LPTV and “Lighthouse” stations to facilitate duplicated programming in both standards. This increases the number of stations providing coverage from full service TV. For the transition to be successful, it is essential that all such stations have a good clear signal within their protected contour.

Protection standards have been set for other services that work well. FM Booster stations constructed within the outer protected contour of the primary station work well, with signals radiating in tandem with the primary station.

Translators now use directional antennas, selected tower sites, and reduced power to provide service along a protected contour. Next Gen can benefit by using existing technology to provide signals within the protected contour.

THE TRANSITION

NTA supports Next Gen translator systems that will bring more services to rural America. Specifically Internet and Data Broadband services will be able to reach some very remote areas of the country that are not now served. Translators are free to all, and often run at a loss or are tax supported locally, as opposed to “for pay services” such as cable and broadband telephone, who are unwilling to build out their systems in view of the sparse and limited customer base rendering them not profitable.

NTA supports Next Gen translator systems and LPTV stations regulation with a protected contour of up to 41db to reduce the number of channels needed to serve the rural population by using Distributed Transmission technology, so long as they do not cover the entire state. In mountainous terrain it now takes several frequencies to reach up canyons, or extend out to the farthest points. Out West an increasing number of people live in rural dispersed locations, including Native American Reservations. Next Gen service there, over the widest area, will provide the most benefit even though the population density is low.

IN CONCLUSION


Section 73.626 rules and related policies should not be subject to revision though rule making in the present state of the art. The public interest in receiving Free TV is protected by the Commission’s 5 year transition plan which uses additional frequencies for duplication of service. NTA believes that this plan should stay in place and that no public interest is served by placing these rules in

question now. Instead, they can be considered at a later date when Next Gen services have begun to establish a measurable track record.

NTA does encourage the Commission to establish now a 41 db protected contour for Next Gen translators and LPTV stations. An increased protected contour for these stations will make a more efficient use of the spectrum with single-frequency distributed technology and will allow Next Gen new internet and data services to be provided for all rural America in sparsely populated areas. Because of the cost, local providers should be able to choose now and plan for Next Gen with increased protected contours in rural areas as television receivers and conversion boxes become available, providing more TV and more internet and broadband services to rural America.

Respectfully submitted,

NATIONAL TRANSLATOR ASSOCIATION

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November 12, 2019